

is requesting this date be moved to **September 17, 2021**.

- Initial Deadline to file all Motions to Amend on or before **February 5, 2021**.
Plaintiff is requesting this date be moved to **June 30, 2021**.
- Initial Deadline for Plaintiff to identify and disclose all expert witnesses and expert reports on or before **May 30, 2021**, and defendant to identify and disclose all expert witnesses and reports on or before **June 27, 2021**. Expert depositions shall be completed by **September 30, 2021**. Plaintiff is requesting these dates be moved to **June 18, 2021** for Plaintiff's Expert Disclosures, and **August 6, 2021** for Defendant's Expert Disclosures, and depositions completed by **September 30, 2021**.

This motion will not affect the trial date of April 5, 2022, or dispositive motion deadline of October 22, 2021.

Respectfully submitted,

s/ Heather Moore Collins
Heather Moore Collins BPR # 026099
Anne Bennett Hunter BPR # 022407
Ashley Shoemaker Walter BPR #037651
Collins & Hunter PLLC
7000 Executive Center Drive, Suite 320
Brentwood, TN 37027
615-724-1996
615-691-7019 FAX
heather@collinshunter.com
anne@collinshunter.com
ashley@collinshunter.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed this the 24th day of March 2021 to counsel of record through the court's CM/ECF system:

Leslie Goff Sanders

Daniel Crowell

WEBB SANDERS PLLC

611 Commerce Street

Suite 3102

Nashville, TN 37203

lsanders@webbsanderslaw.com

dcrowell@webbsanderslaw.com

/s/ Heather Moore Collins

Attorney for Plaintiff